

# **EXHIBIT B**

OCT-31-2005 MON 04:52 PM FINNEGAN HENDERSON

FAX NO. 6508496666

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5 700 Hansen Way  
6 Palo Alto, California 94304  
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10 Attorneys for Defendants  
11 Connectu LLC, Cameron Winklevoss,  
12 Tyler Winklevoss, Howard Winklevoss,  
13 and Divya Narendra

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

THE FACEBOOK, INC.

Plaintiff,

v.

CONNECTU LLC, CAMERON WINKLEVOSS,  
TYLER WINKLEVOSS, HOWARD  
WINKLEVOSS, DIVYA NARENDRA, AND  
DOES 1-25,

Defendants.

CASE NO. 105 CV 047381

**RESPONSE OF DEFENDANT DIVYA  
NARENDRA TO FIRST SET OF  
REQUESTS FOR ADMISSION**

1 **PROPOUNDING PARTY:** Plaintiff THEFACEBOOK, INC.

2 **RESPONDING PARTY:** Defendant DIVYA NARENDRA

3 **SET NO.:** ONE (1)

4 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

5 The above-named party hereby responds, pursuant to California Code of Civil Procedure  
6 Section 2033, to the requests for admission as follows:

7 **RESPONSE TO REQUESTS FOR ADMISSIONS**

8 **RESPONSE TO REQUEST NO. 1:**

9 This Request is Denied.

10 **RESPONSE TO REQUEST NO. 2:**

11 Responding party admits visiting FACEBOOK's website but only in his capacity as a  
12 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to  
13 Request No. 2.

14 **RESPONSE TO REQUEST NO. 3:**

15 Responding party admits visiting FACEBOOK's website but only in his capacity as a  
16 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to  
17 Request No. 3.

18 **RESPONSE TO REQUEST NO. 4:**

19 Responding party admits visiting FACEBOOK's website but only in his capacity as a  
20 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to  
21 Request No. 4.

22 **RESPONSE TO REQUEST NO. 5:**

23 Responding party admits visiting FACEBOOK's website but only in his capacity as a  
24 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to  
25 Request No. 5.

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**RESPONSE TO REQUEST NO. 6:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 6.

**RESPONSE TO REQUEST NO. 7:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 7.

**RESPONSE TO REQUEST NO. 8:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 8.

**RESPONSE TO REQUEST NO. 9:**

This Request is Denied.

**RESPONSE TO REQUEST NO. 10:**

This Request is Denied.

**RESPONSE TO REQUEST NO. 11:**

This Request is Denied.

**RESPONSE TO REQUEST NO. 12:**

This Request is Denied.

**RESPONSE TO REQUEST NO. 13:**

This Request is Denied.

**RESPONSE TO REQUEST NO. 14:**

This Request is Denied.

**RESPONSE TO REQUEST NO. 15:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 15.

**RESPONSE TO REQUEST NO. 16:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 16.

**RESPONSE TO REQUEST NO. 17:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 17.

**RESPONSE TO REQUEST NO. 18:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 18.

**RESPONSE TO REQUEST NO. 19:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 19.

**RESPONSE TO REQUEST NO. 20:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 20.

**RESPONSE TO REQUEST NO. 21:**

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 21.

**RESPONSE TO REQUEST NO. 22:**

This Request is Denied.

1 **RESPONSE TO REQUEST NO. 23:**

2 This Request is Denied.

3 **RESPONSE TO REQUEST NO. 24:**

4 Responding party admits visiting FACEBOOK's website but only in his capacity as a  
5 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to  
6 Request No. 24.

7 **RESPONSE TO REQUEST NO. 25:**

8 This Request is Denied.

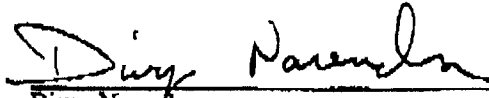
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**VERIFICATION**

DIVYA NARENDRA, under penalty of perjury under the laws of the State of California, states as follows:

1. That he is one of the Defendants in the above-entitled action;
2. That he has read the foregoing RESPONSE OF DEFENDANT DIVYA NARENDRA TO FIRST SET OF REQUESTS FOR ADMISSIONS and knows the contents thereof, and that the same is true of his own knowledge, save and except as to the matters which are therein stated on his information or belief, and as to those matters, he believes it to be true.

Executed on the 31 day of October, 2005, at NY, NY

  
Divya Narendra

1 Scott R. Mosko (State Bar No. 106070)  
2 FINNEGAN, HENDERSON, FARABOW,  
3 GARRETT & DUNNER, L.L.P.  
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DOES 1-25,

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CASE NO. 105 CV 047381

**CERTIFICATE OF SERVICE**

CERTIFICATE OF SERVICE  
CASE NO. 015CV047381



**CERTIFICATE OF SERVICE**

I am a citizen of the United States, over the age of 18 years, and not a party to this action.

My place of employment and business address is 700 Hansen Way, Palo Alto, California 94304-

1016. On October 31, 2005, I caused a copy of the attached;

- **RESPONSE OF DEFENDANT CAMERON WINKLEVOSS TO FIRST SET OF REQUESTS FOR ADMISSION**
- **RESPONSE OF DEFENDANT DIVYA NARENDRA TO FIRST SET OF REQUESTS FOR ADMISSION**
- **RESPONSE OF DEFENDANT CONNECTU LLC TO FIRST SET OF REQUESTS FOR ADMISSION**
- **RESPONSE OF DEFENDANT TYLER WINKLEVOSS TO FIRST SET OF REQUESTS FOR ADMISSION**
- **RESPONSE OF DEFENDANT HOWARD WINKLEVOSS TO FIRST SET OF REQUESTS FOR ADMISSION**
- **RESPONSE OF DEFENDANT CAMERON WINKLEVOSS TO FORM INTERROGATORIES**
- **RESPONSE OF DEFENDANT DIVYA NARENDRA TO FORM INTERROGATORIES**
- **RESPONSE OF DEFENDANT CONNECTU LLC TO FORM INTERROGATORIES**
- **RESPONSE OF DEFENDANT TYLER WINKLEVOSS TO FORM INTERROGATORIES**
- **RESPONSE OF DEFENDANT HOWARD WINKLEVOSS TO FORM INTERROGATORIES**

to be served on all parties as follows:

*Attorneys for Plaintiff*  
Joshua H. Walker, Esq.  
Monty Cooper, Esq.  
**ORRICK, HERRINGTON & SUTCLIFFE LLP**  
1000 March Road  
Menlo Park, CA 94025  
Telephone: 650.614.7400  
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- ☐ Via First Class Mail
- ☐ Via Hand Delivery
- ☐ Via Overnight Courier
- ☒ Via Facsimile


OCT-31-2005 MON 05:00 PM FINNEGAN HENDERSON

FAX NO. 6508496666

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1 I am readily familiar with my firm's practice for collection and processing of  
2 documents by facsimile transmission. I faxed the above documents to the listed facsimile number at  
3 our business offices on October 31, 2005 following ordinary business practice.

4 I declare under penalty of perjury under the laws of the United States that the  
5 foregoing is true and correct, that I am employed in the office of a member of the bar of this court at  
6 whose direction the service was made, and that this declaration was executed on October 31, 2005 at  
7 Palo Alto, California.

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10 Dawn Salazar